

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAFAEL LEE		:
	Plaintiff,	:
- v -		:
KUCKER & BRUH, LLP and		:
ALAN D. KUCKER,		:
	Defendants.	:
-----X		:

12 Civ. 4662 (LGS)

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

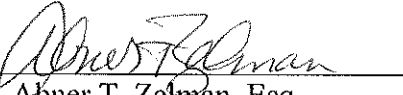
PLEASE TAKE NOTICE that upon the annexed Statement Pursuant to Local Rule 56.1 of Material Facts as to Which There Are No Triable Issues (the "Rule 56.1 Statement"), Declaration of Alan D. Kucker (the "Kucker Declaration" or "Kucker Decl."), Declaration of Abner T. Zelman (the "Zelman Declaration" or "Zelman Decl.") and the Exhibits annexed thereto, and accompanying Memorandum of Law, the Defendants Kucker & Bruh, LLP ("K&B") and Alan D. Kucker, Esq. ("Kucker"), by their undersigned counsel, shall move the Court before the Honorable Lorna G. Schofield, United States District Judge, in the Thurgood Marshall United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, 10007, for an order pursuant to Fed. R. Civ. P. 56 granting summary judgment in favor of the Defendants:

(i) dismissing the complaint asserting claims under the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* (the "FDCPA")("Complaint") of the plaintiff Rafael Lee ("Lee" or the "Plaintiff") commencing this case, and all claims asserted therein by the Plaintiff against the Defendants; and

(ii) affording the Defendants such other and further relief as the Court may deem just and proper (the instant "Motion").

Dated: New York, New York
May 16, 2013

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